

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA
v.
ASHRAF AL SAFOO

|
No. 18 CR 696
Judge Robert Blakey

**GOVERNMENT'S UNOPPOSED MOTION FOR ENTRY OF
PROTECTIVE ORDER GOVERNING SENSITIVE DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d), the United States of America, by JOHN R. LAUSCH, Jr., United States Attorney for the Northern District of Illinois, files its unopposed motion for the entry of a protective order regarding sensitive discovery material, and in support thereof states as follows:

1. The indictment in this case charges defendant with conspiracy to provide material support to a foreign terrorist organization, in violation of Title 18, United States Code, Section 2339B(a)(1).
2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect national security, law enforcement interests and the privacy interests of third parties.
3. The government has discussed the proposed protective order with counsel for defendant, who do not oppose the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order regarding sensitive discovery material.

Respectfully submitted,

JOHN R. LAUSCH, Jr.
United States Attorney

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